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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JOLENE SISSON, individually,

Plaintiff,

v.

THE UNITED STATES OF AMERICA,

Defendant.

Case No. 2:24-cv-00163-APG-BNW

**Stipulation and Order to
Extend Discovery Deadlines**

(First Request)

Pursuant to LR IA 6-1 and LR 26-3, the parties request a sixty (60) day extension of discovery deadlines, which is supported by grounds and circumstances set forth below. This is the first request for an extension of the discovery deadlines.

DISCOVERY COMPLETED

The parties have completed the following discovery:

1. Defendant made its initial disclosures on March 11, 2024.
2. Plaintiff made her initial disclosures on March 7, 2024.
3. Plaintiff served her first set of requests for production, and first set of interrogatories on Defendant on April 3, 2024.
4. Defendant served its responses to Plaintiff's first set of requests for production, and first set of interrogatories on May 16, 2024.
5. Defendant requested and Plaintiff provided HIPAA authorizations to allow Defendant to obtain Plaintiff's pertinent medical records.

1 6. Defendant served its first supplement to initial disclosures of witnesses and
2 documents on May 16, 2024.

3 7. Defendant served its second supplement to initial disclosures of witnesses and
4 documents on May 23, 2024.

5 8. Defendant conducted Plaintiff's Independent Medical Exam on May 30,
6 2024.

7 9. Defendant served its first set of requests for production of documents and its
8 first set of interrogatories to Plaintiff on June 14, 2024.

9 **DISCOVERY REMAINING**

10 Defendant has recently conducted Plaintiff's Independent Medical Exam ("IME"),
11 and during the IME Plaintiff has identified several prior accident medical providers, as well
12 as several current treating providers. Defendant respectfully requests the additional time to
13 obtain the Plaintiff's medical records from her current and prior medical providers,
14 identified during the IME.

15 Defendant is in the process of scheduling Plaintiff's deposition.

16 The parties' initial and rebuttal expert disclosures remain to be completed.

17 The parties reserve the right to engage in any other discovery permitted by
18 applicable rules and within the revised discovery deadlines if the court approves this
19 stipulation.

20 **WHY REMAINING DISCOVERY HAS NOT BEEN COMPLETED**

21 Since the entry of the Scheduling Order (ECF No. 17), the parties have been
22 working diligently to advance discovery. An extension is warranted because it will allow
23 Defendant more time to obtain Plaintiff's remaining medical records from prior and current
24 medical providers and provide them to its expert for review. The extension will allow the
25 parties to address discovery issues and schedule and complete any remaining depositions.

26 The parties' counsel conferred and agreed that a sixty (60) day extension would be
27 proper. The parties agree that neither party will be prejudiced by the proposed extension,
28 and that they may be prejudiced should the current schedule remain in place. The parties

agree the extension is sought in good faith.

EXTENSION OF THE DISCOVERY PLAN AND SCHEDULING ORDER

The following table sets forth the current deadlines and the proposed sixty (60) day extension of discovery deadlines that are the subject of this stipulated request:

SCHEDULED EVENT	CURRENT DEADLINE	PROPOSED DEADLINE
Initial Expert Disclosure	July 11, 2024	September 9, 2024
Rebuttal Expert Disclosure	August 12, 2024	October 11, 2024
Discovery Cutoff	September 9, 2024	November 8, 2024
Dispositive Motions	October 9, 2024	December 9, 2024
Proposed Joint Pretrial Order	November 8, 2024	January 7, 2025 ¹

This request for an extension of time is not sought for any improper purpose including delay. This is the first request for an extension of discovery deadlines in this matter.

Respectfully submitted this 17th day of June 2024.

VEGAS VALLEY INJURY LAW

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IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

DATED: 6/20/2024

¹ However, if dispositive motions were to be filed, the deadline for the Proposed Joint Pretrial Order would be deferred until 30 days after the Court rules on the dispositive motions.